

COUNTERING DISINFORMATION IN BULGARIA: WHAT IS ACHIEVED UNDER THE EU FRAMEWORK AND WHY NOT MORE?

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Abstract

The EU efforts to create a disinformation-proof media ecosystem are fundamental to Europe's recovery. Especially in the light of the current events like the Covid-19 pandemic that led to an infodemic and the war in Ukraine that is accompanied by information war, the capacity of the EU to maintain access to quality information in all Member States is a primary task.

In some countries the vulnerability of the society to disinformation narratives has reached high levels. The degree of coherence and similarity in the implementation of the European Approach to combating disinformation between the Member States is not sufficient. The low media literacy and the low trust in media are additional obstacles to the EU revival in time of crises. Therefore, this paper is focusing on Bulgaria as one of the EU Member States facing greater challenges in the field.

Despite the existence of common EU tools for countering disinformation like the Code of Practice, the Rapid Alert System, etc., the results in Bulgaria are still very limited. This paper argues that in order to be possible for countries as Bulgaria to achieve more in the field, further political, institutional and coordination efforts should be made among the separate Member States, but also at supranational level to better implement EU instruments to tackle disinformation.

The study used a descriptive and analytical method research.

Key words: Countering online disinformation, implementation of the EU instruments, Bulgaria, Code of practice, Rapid alert system

Despite the measures taken at European level and the announcement of a European approach for countering disinformation, the EU and its Member States continue to seek effective solutions to upgrade their policies for tackling this complex problem. This is an essential topic especially in the light of the current events like the Covid-19 pandemic that led to an infodemic and the war in Ukraine that is accompanied by an information war. The EU efforts to create a disinformation-proof media ecosystem are fundamental to Europe's recovery. The capacity of the EU to maintain access to quality information in all Member States is a primary task for Europe, but it seems that it is not the case in all EU countries.

This paper argues that Bulgaria does not have its own national approach to tackle disinformation and the main tools that the country has are provided at European level. There is a lot more that can be done in order to effectively implement these instruments in order to achieve greater results.

This report has two main research objectives: first, to summarize and systematize the EU's actions in countering disinformation by the introduction of EU policy framework as well as the tools provided; second, to analyse what is achieved under this common European framework in Bulgaria and what is the overall situation related to countering disinformation in the country.

The study used a descriptive and analytical method research. The report examines and analyses the actual situation up to September 2022. This paper is focusing on the European instruments to counter disinformation that are already put in place.

1. Introduction of the EU framework and tools

In 2018, the EU recognized online disinformation as a problem which goes beyond disinformation campaigns and propaganda coming from third countries. Since then, the specific steps towards tackling disinformation show that the EU perceives this phenomenon as one of the major challenges towards a more responsible and adequate media environment in the digital age. The EU has not only given a new working definition on disinformation¹, but has also made efforts to build an innovative and comprehensive European approach to address it, including measures of a various nature.

At supranational level, the EU foresees the co-regulatory backstop against disinformation². In December 2020, the European Commission (EC) proposed a legislative package to reform the rules governing digital world in the EU: the

¹ „Disinformation is understood as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm“. See COM(2018) 236 final. *Tackling online disinformation: a European Approach*.

² Ognyanova, N. (2021) „*Nyama da ima Ministerstvo na istinata v ES*“: *po sledite na edno obeshtanie*. In: *Sbornik s dokladi ot mezdunarodna konferentsia*. UI SU“Sv. Kliment Ohridski“, Sofia, pp. 151-172

Digital Services Act (DSA) and the Digital Markets Act (DMA). In essence, this regulation represents the first of the two main pillars of the European counter-disinformation approach. The second one is the self-regulatory instrument – Code of practice, which was adopted in 2018 and further developed and strengthened in June 2022.

The European policy in countering online disinformation is expected to be further developed by various other mechanisms in the field of security or in support of media literacy, quality journalism and research, including through funding of EU projects³. The EU support for tackling disinformation in the period 2015-2020 alone is estimated to be around 50 million euros⁴ and this number is increasing in recent years.

Since the DSA has been adopted but has not yet entered into force at the time of writing this report, the paper focuses on the European instruments to counter disinformation that are already put in place such as the Code of practice, the Rapid Alert System (RAS) and the implementation of the project for European Digital Media Observatory (EDMO) that are part of the Action Plan against disinformation⁵ endorsed by the European Council in December 2018. (Table 1)

**Table 1. Instruments put in place by the EU
for tackling disinformation until September 2022**

	Nature of the instrument	Who is responsible?	Objectives
Code of Practice on Disinformation	Self-regulatory instrument	EC, The Signatories ⁶	<ol style="list-style-type: none"> 1. Demonetisation of disinformation. 2. Transparency of political advertising. 3. Ensuring the integrity of services. 4. Empowering users. 5. Empowering researchers. 6. Empowering the fact-checking community. 7. Transparency and regular updates of relevant data of the implementation of the Code's measures. 8. Strengthened monitoring framework.

³ Yurukova, M. (2022) *Dezinformatsiya online: strategii za prodivodeistvie v ES*.

⁴ European court of auditors. (2021) *Special Report 09/2021: Disinformation affecting the EU: tackled but not tamed*.

⁵ JOIN(2018) 36 final. *Action Plan against Disinformation*.

⁶ The Signatories are online platforms, players from the advertising ecosystem, fact-checkers, civil society, research, and other organizations with specific expertise on disinformation, incl. Google, Meta, Microsoft, TikTok, Twitter etc. The full list could be seen on the European Commission website.

Rapid Alert System	Coordination tool	EEAS, EC, Member States	<ol style="list-style-type: none"> 1. Public information and awareness raising activities. 2. Flagging serious cases to online platforms. 3. Empowering researchers, fact-checkers and civil society. 4. Coordinated response. 5. Coordinated attribution.
European Digital Media Observatory	EU-funded project	Consortium, National/ regional digital media research hubs	<ol style="list-style-type: none"> 1. Creation of a multidisciplinary community composed of fact-checkers, universities, researchers, media organizations and other relevant stakeholders. 2. Establishing a European hub to fight online disinformation, incl. national/ regional digital media research hubs across Europe. 3. Contribute to a deeper understanding of disinformation and facilitating the fight against it.

Despite the measures taken, when it comes to implementation of the European approach in the separate Member States differences have been reported in various analyses⁷. In some countries the vulnerability of the society to disinformation narratives has reached high levels during the Covid-19 pandemic and the war in Ukraine. The degree of coherence in the implementation of the European approach to combating disinformation between the Member States is still low. The low media literacy and the low trust in media are additional obstacles to the EU revival in time of crisis. Countries such as Bulgaria tend to face greater challenges in the field. This is why this paper is focusing on the practical implementation of the EU policy in Bulgaria.

2. Practical implementation in Bulgaria

2.1. Specifics of countering disinformation in the Bulgarian context

Bulgaria has one of the fastest internet connections in the world.⁸ The importance of information provided by digital news⁹ or by other Internet sources

⁷ European court of auditors. (2021) *Special Report 09/2021: Disinformation affecting the EU: tackled but not tamed*. Yurukova, M. (2022) *Dezinformatsiya online: strategii za prodivodeistvie v ES*.

⁸ Bulgaria ranks 3rd in the EU and 7th in the world in terms of the fastest average speed of mobile Internet. See Speedtest Global Index. (2022) *Global Median Speeds August 2022*. Available at: <https://www.speedtest.net/global-index>

⁹ In Bulgaria, the main sources of news are online, including social media, with only 15% paying for news content online. See Newman, N. et al. (2021) *Reuters Institute Digital News Report 2021*. University of Oxford.

continues to grow¹⁰. However, the freedom of speech in Bulgaria remains more threatened¹¹ in comparison to other European countries, and the media and digital literacy level is still lower^{12,13}. This suggests a higher degree of vulnerability to disinformation. Additionally, during Covid-19, the country's low vaccination rates have been linked to the success of disinformation narratives online. From a geopolitical point of view, the strong Russian influence and the historical connection with Russia stand out as a key specificity in Bulgaria, leading to the high effectiveness of Russian propaganda in the country.

In Bulgaria, the policies and legal framework related to the digital environment in a broad sense are completely influenced by the EU. The country formally fulfils its commitments under the EU framework, but neither understands nor seeks to understand or work substantively for the effective implementation of the European approach at national level.

At the moment, Bulgaria is one of the inactive countries regarding the preparation of policies in the field at supranational level. In Bulgaria, there is no comprehensive policy regarding disinformation at national level. There is no clear and unified position of the Bulgarian institutions or representatives on the topic of how to manage the digital media system. Therefore, the proactive participation of the country in the processes of constructing the European approach is an impossible task. The absence of data on how the disinformation is spreading in Bulgaria, as well as the lack of recognition and knowledge of the practical dimensions of European tools, related to online disinformation, marginalize the country's participation in the pan-European discourse. They are insurmountable prerequisites for ineffective application of countermeasures developed at supranational level. The level of commitment of Bulgarian institutions when it comes to implementing the European instruments is low¹⁴, as this paper will show in the text below.

At the beginning of April 2022, the „Bulgarian Coalition against Disinformation“ initiative was launched with the support of the Representation office of the EC in Bulgaria. The initiative was announced as a cooperation with

¹⁰ According to the Media Trust Report of EBU, Bulgaria and Poland stand out as the EU countries with the highest trust in social media and in the Internet in general. The Index shows that between 2020 and 2021 that this trend is increasing in Bulgaria. See European Broadcasting Union (2021) *Trust in media 2021*.

¹¹ According to Freedom House's 2022 World Index of Freedom of Speech, Bulgaria has the status of a free country, but nevertheless ranks last among the EU Member States. See Freedom house, *Freedom in the world 2022: Bulgaria*, Available at: <https://freedomhouse.org/country/bulgaria/freedom-world/2022>

¹² Bulgaria ranks last in EU in terms of media literacy. See Lesenski, M. (2021) *Index na mediinata gramotnost 2021: Dvoina zaplaha: Ustoichivost na falshivi novini po vreme na „infodemiyata“ ot Covid-19*

¹³ According to the Digital Economy and Society Index, the general level of basic digital skills in Bulgaria is the lowest in the EU. See European Commission (EC.) (2021) *Bulgaria country report. In: The Digital Economy and Society Index (DESI)*.

¹⁴ Yurukova, M. (2022) *Dezinformatsiya online: strategii za prodivodeistvie v ES*.

more than 60 partners, with focus on two main topics - Ukraine and Covid-19. No additional information on its implementation could be found, nor what would be the expected results¹⁵.

The existing initiatives of the civil society, related to media literacy and the political will for change in the field demonstrated in the spring of 2022 within the relatively short-lived elected government¹⁶, are not enough to compensate for neither the deficits in implementing the European approach, nor for the lack of a coordinated state policy on the subject. This argument is valid especially when there is no continuity in the policies of the different governments in the country.

In this sense, the application of the European approach in Bulgaria is a natural consequence of the realities in the country. It further reinforces the universal, and valid for all other countries, reasons for increasing differences between the Member States that are outside the scope of this paper.

2.2. Legal framework for countering disinformation in Bulgaria

The Constitution of the Republic of Bulgaria and country's general legal framework of communication rights did not initially differentiate online from offline content.¹⁷ However, in practice, the current regulation does not provide a comprehensive and adequate toolkit so that this principle is guaranteed and adequately protected.

The legal framework for countering disinformation in Bulgaria, although not yet produced, is, in a broad sense, part of the legal framework of the digital environment as a whole. Currently Bulgaria does not have specific legislation for combating disinformation, unlike some EU countries, such as Germany and France, where national legislation exists: in the first case, for managing the digital space, and in the second, for limiting the online spread of fake news during elections. In this sense, the adequate application of the European approach is of even greater importance for Bulgaria than for countries that have their own policies and counterstrategies measures in the field.

¹⁵ Yurukova, M. (2022) *Dezinformatsiya online: strategii za prodivodeistvie v ES*.

¹⁶ At the beginning of April 2022, following statement by the Minister of e-Government Bozhidar Bojanov in front of the MPs from the Parliamentary Committee on Internal Security and Public Order, it became clear that the Bulgarian state was expected to take specific actions to counter disinformation online. They include: creation of a unit for monitoring and analysis of what is happening in social networks and the media; an institutional structure responsible for exchange of information between ministries and regular correspondence with „Meta“ („Facebook“). In the context of the war in Ukraine, Bulgaria has blocked more than 45 thousand malicious Russian IP addresses. Minister Bojanov pointed out that at the moment there is no single state body that has explicit powers in relation to hybrid threats and disinformation in particular in Bulgaria. See Yurukova, M. (2022) *Dezinformatsiya online: strategii za prodivodeistvie v ES*. But after the collapse of the government in June 2022, there is no public information on whether anything is happening with these initiatives that were associated with the figure of the now former Minister of e-Government.

¹⁷ The provision of different punishments for illegal content (pornography) offline and online can be pointed out as an exception that confirms the rule.

Beyond the supranational strategies and policies in relation to disinformation, there have been three unsuccessful attempts to regulate the matter in Bulgaria. However, their objectives did not correspond to those of the DSA. The regulatory tool chosen by the EU aims to protect and ensure freedom of expression in the digital environment by introducing restrictions to the extent to achieve this objective. That was not the case with the three legislative initiatives in Bulgaria proposed in the spring of 2020 in Bulgaria that were not passed by the Parliament after all. They chronologically precede the drafts of DSA and DMA, but yet they did not respond to the main principle for such regulation – to guarantee freedom of speech online. Unlike the European legislative initiative, which tries to comprehensively cover the functioning of online services, taking into account the extreme difficulty of finding balances between incompatible interests as well as between the protection of different rights, the Bulgarian legislative proposals were superficial.

First in 2020, there was an attempt to limit freedom of expression, through the Act on the measures and actions during the State of Emergency in relation to Covid-19 adopted by the National Assembly. An amendment of the Criminal Code was proposed according to which the transmission of „false information about the spread of an infectious disease“ should be considered a crime. These provisions were not adopted due to a partial veto by the head of state, President Rumen Radev. The second legislative initiative was submitted by MPs the parliamentary group „United patriots“. The proposed amendments and additions to the Law on Radio and Television provided new sanctions in the Penal Code for spreading false information; this legislative proposal was rejected by the Parliament. The third legislative initiative foresaw changes and new sanctions in the Personal Data Protection Act. It was supposed to add a text identical to the one of the previous proposals for „disinformation in the Internet environment“.¹⁸

Despite their failure, the attempts to push through legislative initiatives, that were in essence trying to limit freedom of expression and to provoke censorship under the pretext of fighting fake news, are extremely indicative of the risks that regulation of online content in Bulgaria hides. It also shows the lack of understanding of how the Internet is working by the Bulgarian policymakers.

All three proposals had significant shortcomings, including a superficial view of what the effective measures for countering disinformation should look like. Most importantly, they risked violating freedom of speech and provided conditions for censorship in the Bulgarian media environment. While the failure of the three proposals is widely seen as a success for the freedom of speech in the country, they are still a strong indicator for structural problems when it comes to media policy making. Once again, they remind us that the protection of freedom of expression should not be taken for granted, and countering disinformation can be used as a pretext by certain interest groups to restrict this freedom.

¹⁸ Yurukova, M. (2022) *Dezinformatsiya online: strategii za prodivodeistvie v ES*.

2.3. Code of Practice on Disinformation and the Bulgarian specifics

The Code of Practice is the first global disinformation self-regulatory initiative adopted with the consent of its signatories. The ability of the online platforms to self-regulate across the EU countries in a similar, if not identical way becomes a key element to counter disinformation and it is a test for the effectiveness of the Code of Practice. Different institutional and academic analyses indicate both the lack of uniform implementation of the Code by its Signatories and also the divergent implementation in the EU Member States¹⁹.

In the case of Bulgaria, two are the biggest obstacles that lead to a lower engagement of the platforms regarding the content moderation in the country. First, the Bulgarian market is a relatively small and therefore, it is of lower business importance compared to other bigger markets such as Germany, France, Italy and others.

The second remark is related to the language. Bulgarian language is spoken primarily in the borders of the country and the capacity of the platforms to moderate content in languages used by smaller amount of people is questionable. Some analyses are concluding that content written in English is processed many times faster and better than information published in the other languages of the Union.²⁰ Facebook is almost a week slower to flag false content that is not in English.²¹ Based on the data and conclusions drawn in different academic papers, although there is no such data specifically for content in Bulgarian, a reasonable assumption could be made that marking false content by Facebook in countries like Bulgaria is most likely slower in comparison to other bigger European markets. Accordingly, it affects a relatively small segment of disinformation content.²²

These observations regarding the self-regulation instrument are extremely important for the process of forming EU strategies in the future. This process must take into account the national specifics and the differences in the implementation of the European approach in EU countries. It turns out that at the moment it does not involve well enough separate EU Member States, although in its latest proposals, the EC made an attempt to strengthen their role. Even in their monthly reports, the Signatories provide common data for the whole EU. Data for the specific countries is missing. The platforms are taking various actions, projects or initiatives but this is happening only in some EU countries, and this is making an additional differential between the Member States.

¹⁹ Ibid. See also European court of auditors. (2021) *Special Report 09/2021: Disinformation affecting the EU: tackled but not tamed*.

²⁰ AVAAZ. (20 April 2021) *Left Behind: How Facebook is neglecting Europe's infodemic*.

²¹ Ibid.

²² Yurukova, M. (2021) *ES v protses na tursene na resheniya za spraviyane s dezinformatsiyata online - vuzmojni podhodi*. In: Sbornik s dokladi ot mezhdunarodna konferentsia. UI SU „Sv. Kliment Ohridski“, Sofia, pp. 151-172

In addition, platforms are expected to make commitments outside of the Code as well. According to the EU Action plan, online platforms and RAS contact points should cooperate. However, there is no information if this is happening or not. In this context, the European court of auditors (ECA) recommended not only increasing the participation of EU Member States in the RAS, but also more active involvement of the platforms when it comes to implementation of the approach to counter disinformation in the EU and within this instrument²³.

2.4. Rapid Alert System in practice

RAS is under the responsibilities of the European External Action Service. It is the only coordination format where an exchange of information regarding disinformation between various structures of the EU and the Member States occurs. Although the concept of RAS first appeared in the Action Plan against disinformation, the actual mechanism was set up in March 2019, before the MEP elections. The System was used for the first time to tackle disinformation related to Covid-19. The Rapid Alert System is a crucial element of the EU's overall approach for tackling disinformation and is one of the four pillars of the Action Plan.

The Rapid Alert System is set up among the EU institutions and Member States to facilitate sharing of insights related to disinformation campaigns and coordinate responses. RAS is based on open-source information including insights from academia, fact-checkers, online platforms, and international partners. The system allows: early and fast signalling of disinformation campaigns; regular sharing of analysis, trends and reports; developing coordinated responses; discussing good practices for dealing with disinformation and time and resource efficiency. In addition to the daily sharing of information and analysis, the System includes the ability to issue the so-called high priority „alerts“. The assessment of whether a disinformation campaign is significant enough to trigger such an alert is of the responsibility of the relevant EU Member State or institution. There is no established action protocol and in practice each case is assessed individually.

The main idea of RAS is that EU institutions as well as the network of 27 national contact points provide information to the system. These contact points with their active quality work are becoming crucial for the results of these intergovernmental coordination tools. Therefore, they are responsible for their government's participation and sharing of information and best practices within RAS. So, if they are not active or not sharing information, this limits the potential outcomes of this tool.

RAS has been assessed as a useful information sharing tool that is not developing its full potential²⁴. According to an analysis of a study carried out

²³ European court of auditors. (2021) *Special Report 09/2021: Disinformation affecting the EU: tackled but not tamed*.

²⁴ Ibid.

by the ECA, the System does not significantly affect the development of the policy for countering disinformation at national level in the EU Member States²⁵. The meetings of the national contact points are held quarterly, but participation of different Member States varies. The ECA's report concludes that engagement within the System is restricted to a limited number of Member States (about one third). These countries also tend to lead the actions within its scope²⁶.

The public monitoring of RAS shows significant deficiencies in the implementation of this mechanism. First, public information on the implementation of the instrument is limited. There is a lack of public and official information about the appointed contact points in the separate countries²⁷. Therefore, civil control, accountability and transparency of the processes related to RAS work are made practically impossible. In this sense, this paper finds that most of the objectives of the System (*Table 1*) are ineffectively accomplished and that the mechanism should be further evaluated and improved.

In Bulgaria as in other EU countries, there is no clarity about the entity responsible for fulfilling the commitments made within the framework of RAS. There is also lack of information about the activities of the contact unit²⁸. The lack of public information on the topic is additionally related to the political situation in Bulgaria. For less than 18 months in the past 2 years, 4 parliamentary elections have been held in the country. Since 2018, when the EU measures for countering disinformation online intensified, until September 2022, Bulgaria changed 2 elected governments and 3 caretaker governments. The political instability and frequent changes in executive power have led to a further lack of clarity about the responsibilities of different institutions, including related to RAS.

2.5. European Digital Media Observatory

The creation of EDMO is an element of the Commission's detailed Action Plan against disinformation. The plan aims to reinforce capabilities and strengthen cooperation between Member States and the EU in four key areas: improving detection; coordinating responses; working with online platforms and industry; raising awareness and empowering citizens to respond to disinformation online.

²⁵ European court of auditors. (2021) *Special Report 09/2021: Disinformation affecting the EU: tackled but not tamed*.

²⁶ Ibid.

²⁷ The EEAS replied to an official question of a Bulgarian researcher that „because the Rapid alert system is a closed, government-only network“, they cannot „provide any specific information about members of the Rapid alert system or its concrete work“. See Yurukova, M. (2022) *Dezinformatiya online: strategii za prodivodeistvie v ES*.

²⁸ In comparison in some EU countries, there is a public speaking about the work of the contact points and the coordinated activity at the government level within the System.

At the moment, there is a different level of representativeness from country to country in EDMO. So far EDMO hubs operate in Belgium and the Netherlands; Belgium and Luxembourg; Slovakia, Czech Republic and Poland; Spain and Portugal; Denmark, Sweden, Norway and Finland; Ireland; France and Italy. Almost half of the countries in the EU are not covered by the work of EDMO so far. It is evident on the site of EDMO that Bulgaria is one of them. Yet, the EC has launched calls for proposals for new hubs and it is expected that Bulgaria will be covered soon as well. The creation of new hubs would extend the reach and the geographical coverage of the EDMO network across the EU and would help, at least formally, with the reduction of some of the disparities among EU countries.

2.6. Need for more media literacy in Bulgaria

Media literacy is primarily the responsibility of the Member States and the EU has competence to support, coordinate or supplement their actions.

In Bulgaria, media and digital literacy are not well integrated in the educational system. Main effort in this field is made by civil society organisations. Although there are some good practices, they are not yet sufficient and thus, it is not a comprehensive solution.

Despite the emphasis in the Action Plan against disinformation on the need to raise awareness and strengthen society's resilience to disinformation, there is a lack of coherent media literacy strategy in the EU. There are significant differences among the separate EU countries as well.

For example, the EU Member States do not participate evenly in the EU initiative „Media Literacy Week“. By March 2019, over 320 events were organized under the initiative. Their amount reached 360 by the end of September 2020, with almost half of all activities held in France, closely followed by Belgium. There is also a small number of Member States, which have not hosted any events at all. Bulgaria is one of them, accompanied by the Czech Republic and Slovakia²⁹.

A good recommendation is the introduction of a uniform methodology for reporting the development of media literacy in the Member States within the EU-funded projects. This will allow comparison between countries and undertaking targeted efforts in order to reduce the differences.

2.7. Launching fact-checking in Bulgaria

Fact-checking was one of the first solutions against disinformation that appeared after the raised concerns for the negative effect of the spread of false information online within EU.

²⁹ European court of auditors. (2021) *Special Report 09/2021: Disinformation affecting the EU: tackled but not tamed*.

In Bulgaria, as of September 2022, there are four specialized fact-checking projects. Three of these are media outlet's projects: the „FACT CHECK“ platform of the information-analytical website mediapool.bg (launched in 2016, but not functioning constantly until now); PROVERI.AFP by Agency France Presse in Bulgaria (launched in March 2021) and the Fact and Claims Verification Team of the Bulgarian National Radio (BNR) (launched in December 2021). The fourth project, called Factcheck.bg, is an initiative of the Association of European Journalists - Bulgaria (AEJ-Bulgaria) (launched in May 2021).

Until September 2022, two of these initiatives (PROVERI.AFP and Factcheck.bg) were verified signatories of the code of principles of the International Fact-Checking Network at Poynter.

The existing fact-checking organizations in Bulgaria are relatively new, especially in comparison to other European countries. These four initiatives are a step in the right direction of improving the quality of information at national level. Their value is even higher in the context of Bulgaria. According to some researchers, the number of media in the country that fact-checks their materials is „small and grossly insufficient to meet society's needs for reliable, accurate and verified information“³⁰.

Conclusion and recommendations

The European approach for countering disinformation online has its own specifics, which make it unique, innovative and fundamental to the search for governing models in the digital space. The national specifics of Bulgaria provide valuable insights to the impact of the EU approach towards tackling disinformation and its implementation.

The analysis leads to a conclusion that there is a lack of coherence in the implementation of the EU approach to counter disinformation between EU Member States. Taking steps to limit the differences of countering disinformation in the countries should become main goal both at the supranational and national level in order to ensure conditions and prerequisites for its effective implementation throughout the Union.

In conclusion, Bulgaria does not have any additional or specific instrument to countering disinformation except for these provided at European level. This paper argues that even these mechanisms have not been effectively implemented in Bulgaria and the existing tools can be better used in order to achieve their goals both at EU and at national level.

Despite the existence of EU tools, the results in Bulgaria are insufficient. Disinformation narratives persist in the society. The lack of information among

³⁰ Angelov, B. (2021) *Proverkata na fakti v online mediate v Bulgaria*. In: Sbornik s dokladi ot mezdunarodna konferentsia. UI SU „Sv. Kliment Ohridski,“ Sofia, pp. 215

the citizens about public and institutional initiatives related to tackling online disinformation stands out as a major trend. The absence of a common vision and coordinated concept regarding the national approach for guaranteeing a quality media content and information in the digital age continues to be the greater challenges for the country. There is a need for comprehensive strategy for protecting freedom of speech in a post-truth era that also includes mechanisms for countering disinformation. Bulgaria should include critical thinking, media and digital literacy as important parts of the education process. The country should learn how to better use the EU tools. More political, institutional and coordination efforts are needed in order to better implement EU instruments for tackling disinformation in Bulgaria. This way Bulgaria will successfully be a full-fledged participant in the processes at European level.

However, in order to be possible for countries like Bulgaria to achieve more in the field, further efforts should be made at national level by the Member States, but also at supranational level by the EU institutions. In a sense, shared responsibility with clear commitments is required. Furthermore, the lack of feedback provided by the Member States regarding the implementation of different EU instruments for countering disinformation is a major obstacle for successful fulfilment of the European approach. There is a necessity for more monitoring, analyses and evaluation of the commitment of EU countries when it comes to implementation of the common framework.

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